

Marc Wolstenholme
5 Shetland Close
Coventry, England CV5 7LS
Telephone: 044 7827964404
Email: marc@mvwolf-fiction.co.uk
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,

vs.

RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUIN

SECOND DECLARATION OF MARC
WOLSTENHOLME REGARDING PUBLIC
STATEMENTS BY ARCANE CREATORS
AND OTHERS INVOLVED IN THE
MAKING OF ARCANE

FEBRUARY 12, 2025

Dated this: FEBRUARY 12, 2025

M. WOLSTENHOLME.

[MARC WOLSTENHOLME]

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3 **SECOND DECLARATION OF MARC WOLSTENHOLME REGARDING PUBLIC**
4 **STATEMENTS BY ARCANE CREATORS AND OTHERS INVOLVED IN THE**
5 **MAKING OF ARCANE**
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7 I, Marc Wolstenholme, am the Plaintiff in this case. I submit this declaration in
8 support of my claims regarding copyright infringement related to Arcane and its connection to /
9 infringement of my work Bloodborg: The Harvest.
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11
12 **Purpose of this Declaration**

13 This is a continuation of the first declaration. These declarations present publicly
14 available statements made by individuals involved in the production of Arcane, which indicate
15 access to and inspiration from my work. These statements demonstrate potential admissions of
16 influence, borrowing, or references to material that closely aligns with Bloodborg: The Harvest.
17 Additionally, these statements show deliberate deceit in the timelines of development of Arcane.
18 Moreover, these statements show that many fear the NDAs of Riot Games and that minors have
19 been used to lie about ages of themselves during involvement, and timeliness. The Plaintiff
20 alleges that he is concerned over this pattern of lies and theft and deceit, and use and
21 manipulation of vulnerable people, given the wider concerns at Riot Games and their expansion.
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This document begins at Key Figures and Organizations 21, as it's a continuation of DECLARATION OF MARC WOLSTENHOLME REGARDING PUBLIC STATEMENTS BY ARCANE CREATORS AND OTHERS INVOLVED IN THE MAKING OF ARCANE filed on FEBRUARY 09, 2025.

PUBLIC STATEMENTS AND SOURCES

Key Figures and Organizations 21: Monica Macer

Monica Macer served as a consulting producer for the first season of the animated series "Arcane," contributing to all nine episodes released in 2021.

In this capacity, she provided mentorship and guidance to the creative team, particularly in character development and crafting the season's narrative.

Navigating Hollywood- Monica Macer, TV Writer & Executive Producer: Station 11, MacGyver, Queen Sugar, Lost, Prison Break- Premiered on 27 Sept 2022-

https://www.youtube.com/watch?v=S87cKG4qI_w

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2
3 1. Monica explains that on Lost, they did not know what the island was
4 going to be, even after the first series had ended and they sat down to discuss it, they then made
5 an idea but never locked anything in, and it ended up very different.
6

7 2. Monica explains that she found her footing in writing really early and
8 worked hard from there, with loving, and supporting parents.
9
10

11 3. Monica explains that she was an executive producer and showrunner on
12 many projects. She explains the role of showrunner on TV, and how it's different in film.
13

14 4. She is asked why the showrunner's writing rooms are dominated by men.
15 She explains that she doesn't think it is deliberate, its subconscious because people hire their
16 friends and people they have worked with before. She says, "You know who you know, and
17 therefor that's who you staff."
18

19
20 5. Thus, Monica, a consulting producer on Arcane, has confirmed that it is
21 commonplace for shows to not be completely written before they are aired, scripting is still
22 taking place, and people tend to hire their friends and connections for shows.
23
24

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2
3 6. Monica Macer talks about inspiring a younger woman. She says, "After
4 running Queen Sugar, I took a job as a number 2 on a show, I was only there for 2 weeks
5 because my dad was put in a hospice. When I walked into that writers room, and there was
6 another Asian/ American writer, she was like Monica, the number 2. And my heart sank because
7 I had climbed the ladder and worked so hard to get to the showrunner, to hear someone say that,
8 I was like oh my gosh. And I said to that young woman. I'll never do that again."

9
10
11 7. Monica Macer served as the showrunner for Queen Sugar Season 5, which
12 aired in 2021. She took over the role from Ava DuVernay, the show's creator, and guided the
13 series through a season that tackled real-world issues, including the COVID-19 pandemic and
14 racial justice movements. Season 5 of Queen Sugar premiered on February 16, 2021, on the
15 Oprah Winfrey Network (OWN).
16

17
18 8. I believe that the show Monica Macer worked on for two weeks might
19 have been Arcane, and the Asian/ American writer may have been Jane (Jane Chung) Hoffacker.
20

21
22 9. Jane Chung Hoffacker is an Emmy Award-winning producer renowned
23 for her work on the animated series "Arcane," based on the "League of Legends" universe. She
24 served as an executive producer for the series, which premiered on Netflix in 2021.
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4 10. Monica Macer talks extensively about her experiences and projects. She
5 never mentions Arcane.

6
7 11. Monica Macer: MPTF Influencers- 9 Feb 2021- Monica Macer goes on
8 the MPTF Podcast- <https://www.youtube.com/watch?v=sgRSYhomp2E>
9

10
11 12. Monica extensively talks about her experiences and projects. She never
12 mentions Arcane.

13 13. Monica has confirmed that she only worked on Arcane for 2 weeks, she met
14 with a female Asian/ American “writer”, she joined after Feb 2021 and we know she provided
15 mentorship and guidance to the creative team, particularly in character development and crafting
16 the season's narrative. Yet she has distanced herself from involvement.
17

18
19 **Conclusion with Legal Citations**
20

21
22 The evidence regarding Monica Macer’s involvement in Arcane presents
23 inconsistencies in her public statements and raises questions about the extent of her contributions
24 to the series. While she is credited as a consulting producer for all nine episodes, her own
25

26 **6**

27 SECOND DECLARATION OF MARC WOLSTENHOLME REGARDING PUBLIC
28 STATEMENTS BY ARCANE CREATORS AND OTHERS INVOLVED IN THE MAKING OF ARCANE

1
2 statements suggest she only worked on the project briefly—potentially for just two weeks.
3
4 Furthermore, her discussion about industry hiring practices reinforces the idea that Arcane's
5 production team relied on personal connections rather than an open, merit-based selection
6 process.

7
8 Additionally, the fact that Monica Macer never publicly acknowledges her work
9 on Arcane, despite extensive discussions of her other projects, suggests an intentional distancing.
10
11 Her statement about meeting a female Asian-American writer aligns with Jane Chung
12 Hoffacker's known role in Arcane, further corroborating the short-term nature of Macer's
13 involvement.

14
15 Legally, this evidence may be relevant under copyright law, particularly
16 concerning who had actual creative input in the final product and when key creative decisions
17 were made. It supports the Plaintiff's argument that the development process of Arcane was
18 inconsistent, potentially rushed, and possibly relied on pre-existing materials rather than an
19 organic creative process.
20
21

Legal Citations Supporting the Plaintiff's Claims

17 U.S.C. § 106 – Establishes the exclusive rights of a copyright holder, including the right to reproduce and create derivative works. If Monica Macer's brief tenure meant she contributed minimally to the final script, it raises concerns about whether other source materials—potentially the Plaintiff's—were used instead.

Feist Publications, Inc. v. Rural Telephone Service Co., 499 U.S. 340 (1991) – Establishes that originality is the cornerstone of copyright protection. If Arcane's script development involved substantial copying from pre-existing materials, it could undermine its claim to originality.

Three Boys Music Corp. v. Bolton, 212 F.3d 477 (9th Cir. 2000) – Demonstrates that access and similarity are critical in proving copyright infringement. If individuals involved in Arcane had access to the Plaintiff's work and there are substantial similarities, this supports the infringement claim.

Sheldon v. Metro-Goldwyn Pictures Corp., 309 U.S. 390 (1940) – States that even small contributions to a larger work do not preclude infringement if the copied material is

substantial and qualitatively significant. The Plaintiff can argue that Arcane's development relied heavily on prior, uncredited materials.

Williams v. Gaye, 885 F.3d 1150 (9th Cir. 2018) – A case that highlights the role of expert testimony in determining substantial similarity. If expert analysis shows that Arcane's storyline, themes, or character development significantly resemble the Plaintiff's prior work, it bolsters the claim.

Final Assessment

The inconsistencies in Monica Macer's involvement, coupled with her lack of public acknowledgment of Arcane, support the argument that Arcane's writing process was fragmented and potentially reliant on external sources. The Plaintiff's claim that their original work influenced Arcane is strengthened by these findings, particularly if further discovery or expert testimony establishes clear similarities.

Key Figures and Organizations 22: Jane Chung Hoffacker

Jane Chung Hoffacker won a Primetime Emmy Award in 2022 for her work as an executive producer on the animated series "Arcane."

24 May 2024- Justin Gary- Jane Chung Hoffacker — From League of Legends to animating Arcane, Rhythms of Guitar Hero, and Ma...

<https://www.youtube.com/watch?v=GtvWmaqSPuM>

1. Jane talks about her history and entry into the gaming industry.
2. She talks about building a studio for animation for Riot Games and figuring it out.
3. She talks about her role, being going to find people to figure out gaps.
4. She explained that her creative involvement in Arcane (But she doesn't mention its name) was very minimal. There was a showrunner with a vision, Christian Linke, she believed in his vision and wanted to help make that happen.

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2
3 5. Jane explains that they had to get the show greenlit, they had a lot of stops
4 and starts trying to get the show greenlit. They had failed a couple of times, so they had to try
5 and figure out the show in the writers' room, along with what talent they needed to be able to
6 carry this across the line, so a lot of it became reading through a lot of scripts she got submitted
7 to them, and learning how to work with agents. She explains she had to hire script writers and
8 hire into the writers room.
9

10
11 6. Then she states that she then had to learn how to control a writers room.
12 Even if she wasn't the one saying like, Vi has pink hair, she had to influence the conditions and
13 the talent working on it.
14

15
16 7. She speaks about the work in a writing room. She states that they are
17 usually given 11 weeks to write and so much budget to write 22 episodes or whatever it is.
18

19 8. Jane explains that sometimes you need females for the female video in the
20 scripts.
21
22
23
24

1
2 9. She explains that the showrunner, or someone, will come up with the show
3 bible. Then you move into the writers room and the staffing of it. She talks about it being start
4 and stop. She still doesn't name Arcane.
5

6
7 10. She is asked what the timeline looks like, from starting in the writers
8 rooms, to ready to put this out there. She is audibly uncomfortable. She states that she doesn't
9 know, it's hard to answer. Because we had to build a studio. Most people don't do that.
10

11
12 11. She states normally, if you have a studio ready to go. Once the scripts are
13 approved. It has a lot of requirements, eventually when it's approved, you hand it to the
14 storyboard artist.
15

16
17 12. It seems that Jane has distanced herself from the Arcane project, not even
18 mentioning it by name. She has also distanced herself from the creative side, placing it on Linke.
19 She also failed to answer the question about timelines. Jane has also admitted to receiving and
20 reading submitted manuscripts.
21

Conclusion and Legal Citations for Jane Chung Hoffacker's Statements

Jane Chung Hoffacker's statements suggest a deliberate effort to distance herself from direct creative involvement in Arcane. Despite her role as an executive producer and a key figure in hiring writers and shaping the production process, she avoids explicitly naming the project, which is unusual for someone in such a high-profile position.

Her discussion of Arcane's troubled greenlighting process, the hiring of writers, and the structuring of the writing room—combined with her reluctance to discuss production timelines—raises questions about the transparency of the development process. Her admission that she read and evaluated submitted manuscripts suggests that Riot Games solicited and reviewed outside material, which could support the Plaintiff's claim of unauthorized use of copyrighted works.

Furthermore, her claim of minimal creative involvement conflicts with her role in managing the writing process, indicating a possible attempt to minimize legal exposure. This raises concerns about Riot Games' internal documentation of the development process and whether it properly credits or acknowledges external contributions.

Jane was awarded a Primetime Emmy Award in 2022 for her work as an executive producer on Arcane, yet she states that her creative role was minimal—more akin to a coordinator than an executive producer, by her own admissions. This discrepancy raises concerns about the legitimacy of the awards, the accuracy of professional titles, and the actual contributions of key figures to the production of Arcane. If executive producer credits were granted without substantial creative input, it may indicate a misrepresentation of industry standards, possibly undermining the credibility of such recognitions.

The Plaintiff has raised concerns regarding potentially fraudulent job titles, altered CVs, and inconsistencies in the timelines of individuals who claimed to have worked on Arcane. These discrepancies could have significant implications for data integrity, workforce credibility, and the broader creative industries. If individuals misrepresented their work on Arcane, this could contribute to systemic fraud, enabling unqualified individuals to leverage inflated credentials—what others refer to as the "Riot Springboard"—to secure subsequent roles in creative industries under false pretenses. Such actions could lead to financial instability and even corporate bankruptcy should these individuals fail to perform in high-stakes creative and managerial positions.

1
2 From a legal standpoint, these concerns may warrant further scrutiny under False
3 Advertising and Fraudulent Misrepresentation statutes. Under 15 U.S.C. § 1125(a) of the
4 Lanham Act, false or misleading representation of a product, service, or professional
5 qualifications in commerce is prohibited. Misrepresentation of credentials or job titles could
6 constitute fraudulent misrepresentation if a party relied on these misstatements to their detriment
7 (Restatement (Second) of Torts § 525). Additionally, employment fraud through
8 misrepresentation may implicate 18 U.S.C. § 1001, which criminalizes false statements made in
9 matters within the jurisdiction of the U.S. government, should regulatory agencies, such as the
10 Federal Trade Commission (FTC) or the Securities and Exchange Commission (SEC), become
11 involved.
12
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16 The Federal Trade Commission (FTC), as the regulatory authority overseeing
17 unfair business practices and consumer deception (15 U.S.C. § 45 - FTC Act), may need to
18 investigate whether fraudulent or misleading employment practices have been used to inflate the
19 reputations of individuals or the company itself. If these misrepresentations were used to gain
20 industry awards, contracts, or investment, there may also be securities fraud implications under
21 15 U.S.C. §§ 78j and 78n.
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3 Given these findings, the Plaintiff reserves the right to seek further legal remedies
4 and involve relevant regulatory agencies should additional evidence substantiate a pattern of
5 fraudulent misrepresentation. The legitimacy of Arcane's production credits, award nominations,
6 and employment records may require external auditing to ensure compliance with industry
7 standards and federal laws.
8

9
10 **Legal Citations Supporting Plaintiff's Claims:**

11 17 U.S.C. § 106 – Grants exclusive rights to authors over their original works,
12 including reproduction, derivative works, and distribution. If unsolicited manuscripts were used
13 without permission, this could constitute infringement.
14

15 17 U.S.C. § 501 – Defines copyright infringement as the violation of any of the
16 exclusive rights granted by copyright law, including unauthorized adaptation or reproduction of a
17 work.
18

19 Sheldon v. Metro-Goldwyn Pictures Corp., 309 U.S. 390 (1940) – Establishes that
20 substantial similarity between an original work and an allegedly infringing work, coupled with
21 access, can be sufficient to prove infringement.
22

23 Castle Rock Entertainment, Inc. v. Carol Publishing Group, Inc., 150 F.3d 132 (2d
24 Cir. 1998) – Addresses the issue of derivative works and unauthorized adaptation, relevant if
25 Arcane incorporated elements from plaintiff's submissions.
26

Three Boys Music Corp. v. Bolton, 212 F.3d 477 (9th Cir. 2000) – Establishes that evidence of access and similarities between works can indicate unauthorized copying.

Rogers v. Koons, 960 F.2d 301 (2d Cir. 1992) – Discusses the burden of proof in copyright cases, reinforcing that once access is demonstrated, substantial similarity may indicate infringement.

Implications:

Hoffacker’s reluctance to name Arcane while discussing the process raises red flags. If external scripts or concepts were reviewed and incorporated into the final product without authorization, this would be a key factor in proving infringement. Given her admissions about script submissions, it is reasonable to pursue further discovery to determine if Riot Games retained, referenced, or integrated any of the Plaintiff’s copyrighted materials.

Key Figures and Organizations 23: Amanda Overton

Writer of Arcane, Executive Producer of Season 2.

Not-So-Average-Fangirl- Streamed live on 16 Nov 2024- •• Arcane S2 Ep4

Watch Party with Amanda Overton and Katy Townsend ••

<https://www.youtube.com/watch?v=bgpWJl1NuTE>

1. Katy states that she auditioned for Overton many years before on a different project, she states that they are both queer, so they had that connection.
2. Katy explains that Maddie was very much like her character as Subie.
3. Overton invited Katie to audition.
4. Overton states that she had finished writing season 2 before season 1 came out.
5. Katy states that Overton had written a character with her in mind, but she still had to audition.
6. A bit of Katies looks were added into the visual character development.
7. The viewers type in questions.
8. Watching the show live, Overton says that one of the guys is a reused character from season 1.

1
2 9. 57 minutes in, Amanda Overton states that she got the job because she
3 interviewed for it 6 years ago.
4

5 10. 6 years from Nov 2024 takes us back to Nov 2018.

6 11. The team read one of her scripts, they liked it, she went in and
7 interviewed.
8

9 12. She states that she watched the pilot which was different back then.

10 13. Overton states that Alex Yee created many of the characters in LOL- this
11 is incorrect, he didn't.

12 14. She talks about making them change the pilot, because they didn't
13 understand the story.
14

15 15. In the first week, she told them this was a story about the two sisters, so
16 they need to change it.

17 16. The viewers type questions for them.

18 17. Overton said they knew from the beginning that they had two seasons to
19 map the story.
20

21 18. Early reports stated that they wanted to produce 5 seasons. Linke also
22 spoke of not having enough time and having to squeeze it into two seasons in the end.

23 19. Overton states that a lot of things for Caitlyn didn't exist in the game so
24 she got to help develop this character more.
25

1
2 20. Overton is asked what the typical day was like for writing.

3
4 21. Overton huffs out and audibly shows stress (1:30 minutes).

5 22. She states, "So many different experiences writing this show, we did have
6 a writers room, they broke the story and passed it off the animation.

7 23. She states that Covid happened when they were writing season 2, so it
8 derailed that, so they ended up working from home.

9
10 24. Overton states that over zoom calls during lock-down, the writing team
11 shrunk to just her, Linke and Yee. She states that they then broke a lot of the stories for season 2
12 with Fortiche Production.

13 25. This isn't what Riot's solicitors stated in the 2021 letter in which they
14 claimed the scripts were all locked in before the end of 2019.

15
16 26. This also contradicts what Amanda states in Bridging the Rift, when she
17 said, that *"I did have one of the writers teach me how to shoot a gun, like a sniper gun, right
18 before I was going to write Caitlyn's episode last year."*

19 27. Amanda Overton contributed significantly to the development of Caitlyn's
20 character in Arcane. She wrote Episode 5, titled "Everybody Wants to Be My Enemy," where
21 Caitlyn's partnership with Vi begins to take shape

22
23 28. Last year, way late into the stages of the fake timelines, and Caitlyn's
24 episode, 5, still wasn't written. Spoiler but later I'll show you that Arcane: Bridging the Rift was

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2
3 filmed in the latter half of 2021 alongside the actual making of Arcane. But much had to be cut
4 because of my IP claim made on the 24th of November 2021. This shows that Mid to late 2020,
5 the show (Episode 5) wasn't written.

6 29. Thus she wrote episode 5 of season one, during lock-down. She shot the
7 rifle before the restrictions, or in the re-lifting of restrictions in 2020. She has simply switched
8 this to season 2, which I allege is fraud to mask IP theft.

9
10 30. Back on the podcast, Amanda says that one of the writers from season 1,
11 was a gun enthusiast, he taught her to shoot in preparation to writing.

12 31. Amanda is asked about her favourite songs from Arcane. She talks a little
13 then says, "I think "Enemy" by Imagine Dragons also has a special place in my heart because
14 Christian let us listen to that before we even started writing. Christian knew Imagine Dragons
15 guys from before, and they had written that song for Vi, before we had even written any of the
16 show."

17
18 32. Amanda stated that she then wrote the song into her episode, so they put it
19 in her episode (5).

20 33. "Enemy" by Imagine Dragons, featuring JID, was released on October 28,
21 2021.
22
23
24

Arcane S2 E8 Watch Party with Wee Lass Reacts, Amanda Overton, Katy Townsend, and Kimberly Brooks!- Not-So-Average-Fangirl- treamed live on 23 Nov 2024
<https://www.youtube.com/watch?v=UZVuH-P5ko8>

34. Overton states she has 6 years of secrets from the show.

35. Overton stated that she is the Executive Producer of season 2.

36. Kimberly Brooks (Sky) talks about joining the show, and states that the show moved around to different locations.

37. Overton again states that they wrote season 2 before season 1 came out. She also re-states that she worked on Arcane for 6 years.

38. Kimberly Brooks asked Overton about the differences from writing season 1 to season 2.

39. The answer is navigated around.

40. When asked about being involved in future LOL projects, Amanda states that she can't talk about that, but maybe.

41. She talks about Riot working on other stories.

Conclusion and Legal Citations Supporting the Plaintiff's Claims

Amanda Overton's statements across multiple public discussions and interviews present significant contradictions regarding the timeline and development of Arcane. She claims to have worked on the series for six years, which would place her involvement as early as late 2018. However, this contradicts Riot Games' legal counsel's assertion in 2021 that all scripts were completed and locked by the end of 2019, because why is she still writing late into 2021 and then up to 2024 if her role was over long before. Furthermore, Overton's own words suggest that critical aspects of Arcane, including Caitlyn's character development and key episodes, were still being written during COVID-19 lockdowns in 2020-2021. This aligns with the plaintiff's claims that the timeline Riot has publicly stated regarding Arcane's development has been falsified to conceal the theft of intellectual property.

Overton's assertion that Enemy by Imagine Dragons was written specifically for Arcane before any script was completed further conflicts with established production norms. The song was officially released in October 2021, yet Overton states that the writing team was allowed to listen to it "before we even started writing." This implies a retroactive modification of Arcane's timeline to fit a narrative that contradicts official legal claims made by Riot Games.

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3 Additionally, Overton's statement that the Arcane writers' room shrank to just
4 three people (herself, Christian Linke, and Alex Yee) during COVID-19 suggests that a major
5 restructuring of the narrative occurred well into 2020. This further contradicts the claim that all
6 scripts were finalized by 2019. If the story was still being shaped alongside Fortiche Production
7 during this period, this suggests a process of adaptive writing that took place concurrently with
8 the animation—aligning with the plaintiff's argument that Arcane was still being actively written
9 and constructed after the submission of the Bloodborg manuscript.
10

11
12 Furthermore, Overton's reference to changing the Arcane pilot aligns with broader
13 concerns regarding how the original premise was developed. If she had to instruct the team to
14 rework the narrative to center on the two sisters, it indicates that even fundamental story
15 elements were unsettled when she joined. This raises serious doubts about Riot Games' claim
16 that the show's narrative was fully formed years before its release, and of the competency of the
17 original story writers and showrunners.
18

19
20 The inconsistencies in Overton's statements support the plaintiff's allegations that
21 key personnel within Riot Games misrepresented timelines and project milestones to obscure the
22 origins of Arcane's story development.
23

Legal Citations Supporting the Plaintiff's Claims

False Statements and Fraudulent Representation

Under 18 U.S. Code § 1001, making false statements or concealing material facts in matters within the jurisdiction of the U.S. government (including courts) is a federal offense. Overton's conflicting claims, combined with Riot Games' legal representations in 2021, raise concerns regarding misrepresentation in legal proceedings.

Intellectual Property Infringement and Fraudulent Misrepresentation

The Lanham Act (15 U.S. Code § 1125) prohibits false designations of origin and deceptive practices in commerce, including falsely attributing authorship or misrepresenting the development of creative works.

Riot's inconsistent statements regarding Arcane's timeline, combined with Overton's admissions that story elements were actively rewritten in 2020-2021, suggest deliberate obfuscation of the true origins of Arcane's narrative.

Copyright Violations and Derivative Works

17 U.S. Code § 106 grants exclusive rights to the original creator of a copyrighted work, including the right to create derivative works.

If Arcane was actively being written and revised during the same period that the Bloodborg manuscript was accessible to Riot Games, this strengthens claims of unauthorized adaptation.

Fraud in Employment Representation

Overton's statements raise concerns about fraudulent job titles and experience claims, potentially violating Federal Trade Commission (FTC) guidelines on employment misrepresentation (16 CFR Part 254).

The "Riot Springboard" practice of inflating credentials and using false experience claims for career advancement could constitute fraud under False Claims Act (31 U.S. Code §§ 3729-3733) if public or investment funds were used under false pretenses.

Perjury and Material Misstatements in Legal Filings

Riot Games' 2021 legal filings stated that all scripts were locked in 2019, yet Overton's statements confirm that major story changes occurred during lockdown in 2020-2021.

Under California Penal Code § 118, knowingly making false statements under oath (including in legal declarations) is perjury.

Employment Discrimination and Nepotism in Hiring Practices

Overton's admission that Katy Townsend was personally invited to audition because they shared a connection as queer women, and her reference to hiring preferences in Arcane's production, could be violations of Title VII of the Civil Rights Act (42 U.S. Code § 2000e-2), which prohibits employment decisions based on gender, sexual orientation, or personal relationships.

Consumer and Market Fraud – Misrepresentation of Award Merit

The plaintiff raises concerns about the legitimacy of Arcane's awards given Overton's admission of minimal executive involvement. If awards were granted based on

misrepresented contributions, this could be subject to Federal Trade Commission Act (15 U.S. Code § 45), which prohibits deceptive acts in commerce.

Data Accuracy and Business Integrity

The pattern of misleading employment credentials and timeline inconsistencies poses a risk to broader corporate integrity and compliance, potentially falling under Sarbanes-Oxley Act (18 U.S. Code § 1519) regarding corporate fraud and record falsification.

Final Assessment

Overton's statements not only contradict Riot Games' legal assertions but also reveal a pattern of revisionist history that aligns with the plaintiff's allegations of Arcane's unauthorized derivation from Bloodborg. The shifting narratives, employment misrepresentations, and misattributions of creative contributions all support claims that Riot Games engaged in fraudulent business practices to obscure potential intellectual property violations. Given the mounting evidence, regulatory bodies such as the FTC, U.S. Copyright Office, and Department of Justice (DOJ) Intellectual Property Task Force may need to be alerted to potential misconduct.

Key Figures and Organizations 24: United Talent Agency (UTA) and Curtis

Brown Group update.

Casting

Plaintiff has already shown substantial connections between the casting of Arcane and Curtis Brown Group, which is a subsidiary of United Talent Agency (UTA). An update shows that at least six of the biggest cast members of Arcane are represented by UTA and its subsidiary Curtis Brown Group.

The following cast members from Arcane are represented by the Curtis Brown Group:

1. Ella Purnell: Voices Jinx.
2. Harry Lloyd: Voices Viktor.
3. Katie Leung: Voices Caitlyn Kiramman.

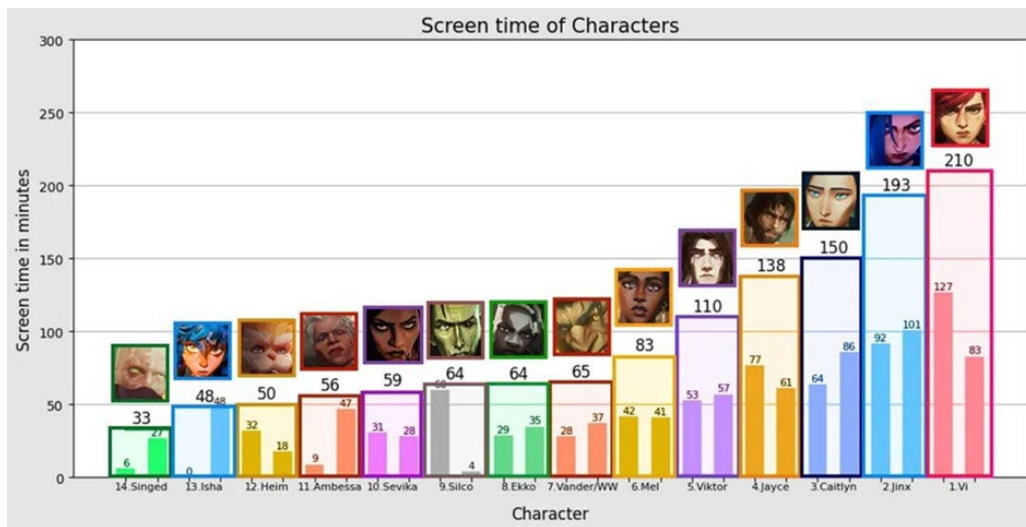
The following cast members from Arcane are represented by United Talent Agency (UTA):

1. Hailee Steinfeld: Voices Vi.
2. Kevin Alejandro: Voices Jayce Talis.
3. Jason Spisak: Voices Silco.

Top Five

Five of these characters represented by UTA and Curtis Brown Group received significantly more screen time than most, with Steinfeld, Purnell and Leung being the top three, Kevin Alejandro in fourth place and Lloyd being the 5th most onscreen character. That's the top five roles in Arcane, cast by the same conglomerate, who has been evidence to have been sent Bloodbrog, and has a history of ongoing copyright concerns of the M.W. Wolf catalog of Fiction. Moreover, 3. Jason Spisak, as Silco, represented by UTA, is joint 7th for most screen time. Silco is also perhaps one of the most iconic and plot-wise important roles.

This evidences relationships between Riot Games and the two linked agencies of UTA and Curtis Brown Group. This also evidences their involvement in Arcane. It is alleged that this hints at leveraging of screen time for talent in exchange for submitted content, which does not belong to them.



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SECOND DECLARATION OF MARC WOLSTENHOLME REGARDING PUBLIC STATEMENTS BY ARCANES CREATORS AND OTHERS INVOLVED IN THE MAKING OF ARCANES

Acquisition, Valuations and Collaborations

Acquisition

The specific duration of the negotiations leading to United Talent Agency's (UTA) acquisition of Curtis Brown Group (CBG) has not been publicly disclosed. The acquisition was announced on June 13, 2022.

These deals can take many years. Companies work through many stages of negotiations & Due Diligence (3-12 months), Regulatory Approvals (3-6 months, if needed), Internal Approvals & Structuring (2-6 months), Closing & Integration (3-12 months post-announcement).

During these mergers, good will “Favors” are common to showcase how the companies can effectively work together and benefit each other. This is seen as a part of due diligence, to see if they are a good match.

Comparison to Similar Deals

Creative Artists Agency (CAA) acquiring ICM Partners (another major talent agency) took about 9 months (announced in September 2021, completed in June 2022).

Endeavor acquiring WME (another talent agency) took around 2 years (due to regulatory scrutiny).

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3 ***Valuations***

4 Additionally, during these transitions, the company being bought out has a
5 monetary incentive to make the company's assets, such as IP, scripts, talent and recent deals,
6 appear to be highly valued commodities. Thus, a massive deal such as Arcane, with Riot Games,
7 being the biggest video game company in the world, who are known to splash about money, with
8 deal sweeteners of populating the show with multiple talent from both agencies, is an effective
9 strategy to make both agencies and their assets valued high at the time of sale, to convince major
10 stakeholders to agree to the buyout deals.
11

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13 ***Collaborations***

14 Prior to their formal acquisition in June 2022, United Talent Agency (UTA) and
15 Curtis Brown Group (CBG) collaborated on representing several high-profile clients. Notable
16 shared clients included actors such as Damian Lewis, Lily James, Alicia Vikander, and Bel
17 Powley. They also jointly represented screenwriters like David Farr (The Night Manager,
18 Hanna), Georgia Pritchett (Succession, Veep, The Shrink Next Door), and Tony Roche
19 (Succession, The Thick of It).
20

21 These collaborations exemplify the agencies combined efforts to provide
22 comprehensive representation across both U.S. and European markets. The successful
23
24

partnerships in managing these clients laid a strong foundation for UTA's eventual acquisition of CBG, aiming to further expand global opportunities for their talent.

Screen time

From the chart:

Represented by UTA & CBG

Vi (Hailee Steinfeld): 210 minutes

Jayce (Kevin Alejandro): 138 minutes

Silco (Jason Spisak): 83 minutes

Caitlyn (Katie Leung): 150 minutes

Viktor (Harry Lloyd): 110 minutes

Jinx (Ella Purnell): 193 minutes

Total screen time for all six characters: 884 minutes.

From the chart:

All others of the main cast on the chart.

Singed: 33 minutes

Isha: 48 minutes

Heimerdinger: 50 minutes

Ambessa: 56 minutes

Sevika: 59 minutes

Ekko: 64 minutes

Vander/WW: 65 minutes

Mel: 83 minutes

Total screen time for the remaining characters excluding the six we already counted: 458 minutes.

The total screen time of all characters in the chart is 1342 minutes.

884 is approximately 65.88% of 1342. This means that these six members of the cast represented by UTA & CBG had 65 % of screen time of the main cast.

458 is approximately 51.81% of 884. This means that the six members of the cast represented by UTA & CBG had almost exactly 50% more screen time than the rest of the eight main cast members.

Plaintiff Alleges.

Thus, the two agencies did not merge overnight. CBG had my Bloodborg: The Harvest manuscript in 2019 and in 2020. This has been evidenced. During the same period, CBG and UTA were in collaboration and perhaps already in discussions about merging. Between the two, they represented at least 42.86% of the main cast. Thus, almost half. This isn't a

1
2 coincidence. My manuscript was also submitted to Riot Forge, but this is evidence that cannot be
3 ignored. This proves a compelling correlation between the representation of voice actors in
4 Arcane by United Talent Agency (UTA) and Curtis Brown Group (CBG) and their screen time
5 prominence. The provided data supports a pattern where actors from these agencies dominate the
6 screen presence, suggesting potential preferential casting.
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10 ***Key Findings***

11 *Screen Time Dominance:*

12 The six main actors represented by UTA & CBG collectively accounted for
13 65.88% of total screen time among the main cast.

14 Their screen time was almost 50% higher than the remaining main cast members.
15

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17 *Casting & Industry Connections:*

18 UTA & CBG's historical collaborations suggest a longstanding relationship before
19 their official merger in June 2022.

20 The acquisition process typically involves extensive goodwill and "favor"
21 exchanges, making it plausible that UTA & CBG exerted influence over Arcane's casting.
22

Allegation of Impropriety:

The Plaintiff alleges that the selection of cast members from UTA & CBG was not purely based on merit but was a strategic move to elevate these agencies' valuation ahead of the merger.

Given that CBG had prior access to Bloodborg: The Harvest in 2019 and 2020, and UTA was already collaborating with them, this presents a potential conflict of interest.

If these agencies leveraged Arcane as a way to showcase their talent and improve their market valuation, this could amount to industry manipulation.

What This Means

The pattern outlined in the statement and chart suggests a systemic favoritism toward UTA & CBG-represented talent in Arcane, which raises broader concerns:

Conflict of Interest in Casting Decisions: If cast decisions were influenced by agency negotiations rather than talent suitability, this undermines industry fairness.

Potential Fraudulent Representation: The Plaintiff suggests that the agencies may have misrepresented their talent's contributions or inflated their impact, calling into question the legitimacy of awards and contracts.

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3 *Impact on Copyright Infringement Allegations:* If UTA & CBG played a role in
4 the development process while having prior access to the Plaintiff's work, it strengthens the
5 claim that elements of Bloodborg: The Harvest could have been misused.

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7 **Legal Citations Supporting Plaintiff's Claims**

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9 *Unfair Competition (Lanham Act, 15 U.S.C. § 1125(a))*

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12 If UTA & CBG engaged in misrepresentation regarding casting processes or their
13 talent's involvement in Arcane, this could constitute unfair competition through deceptive trade
14 practices.

15 *Fraud in Inducement (Restatement (Second) of Torts § 525)*

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18 If Riot Games or UTA & CBG misrepresented the casting process or role
19 contributions to artificially inflate agency valuation, this could qualify as fraudulent inducement.

20 Intellectual Property Misappropriation (17 U.S.C. § 501 - Copyright
21 Infringement)

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2 If CBG had prior access to Bloodborg: The Harvest and was simultaneously
3 collaborating with Riot Games, this may constitute copyright infringement if elements were
4 improperly used.
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7 *Breach of Fiduciary Duty (California Civil Code § 1572 - Actual Fraud)*
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10 If UTA & CBG knowingly prioritized their internal interests over fair industry
11 practices, their actions could be challenged under fiduciary responsibility laws.
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13 *Antitrust Concerns (Sherman Act, 15 U.S.C. § 1-2)*
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16 If UTA & CBG engaged in monopolistic practices by consolidating casting
17 influence, this could warrant antitrust scrutiny.
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Conclusion

The analysis strongly indicates that UTA & CBG had an outsized influence on Arcane's casting, which aligns with their industry collaboration and eventual merger. The significant screen time given to actors from these agencies suggests possible strategic maneuvering to enhance agency valuation, rather than pure artistic merit. The Plaintiff's claims of favoritism, potential fraud, and copyright misuse merit further legal examination under unfair competition, fraud, and IP misappropriation laws.

Key Findings

Inconsistencies in Timeline Statements – Multiple individuals involved in Arcane have provided contradictory statements regarding the timeline of the scriptwriting, casting, and production phases. Some statements contradict Riot Games’ official position that scripts were finalized by 2019.

Employment Title Discrepancies – Individuals such as Jane Chung Hoffacker and others have been given prominent production titles but later downplayed their roles, which raises concerns about misleading credentials.

Manipulated Production Credits and Award Recognition – The recognition of specific individuals for awards, despite their minimal stated contributions, suggests possible industry misrepresentation regarding Arcane's production.

Use of External Submissions – Multiple individuals, including Hoffacker, have admitted to reviewing submitted scripts and manuscripts, raising concerns about potential unauthorized use of external creative works.

Contradictions in Writing and Animation Process – Statements from Amanda Overton and others indicate that major story elements were still being written and altered during COVID-19, contradicting Riot Games' prior claim that all scripts were locked before 2019.

Agency-Casting Relationship Concerns – The screen time majority of the main Arcane cast is represented by United Talent Agency (UTA) and Curtis Brown Group, the latter of which had access to the Plaintiff's work. The preferential casting of actors from these agencies raises concerns about potential quid pro quo deals in the entertainment industry.

Merger-Driven Influence on Production – The timing of UTA's acquisition of Curtis Brown Group suggests that Arcane was used as a tool to enhance CBG's valuation and secure the buyout.

False Statements Regarding Production Practices – The Plaintiff alleges that several figures involved in Arcane have made misleading public statements to cover up the true nature of the production, including shifting project timelines and fabricating early development stages.

Conclusion

The evidence presented in this declaration underscores significant inconsistencies and discrepancies in the public and legal statements surrounding the production of Arcane. The conflicting accounts from key individuals, combined with admissions of reviewing external manuscripts, indicate a pattern of obfuscation and potential misrepresentation.

The Plaintiff asserts that Riot Games and its associates deliberately concealed material facts about Arcane's development timeline, scriptwriting process, and the sourcing of creative materials. The strong agency connections with key cast members, alongside the preferential treatment in casting, further raise concerns about possible exploitation of creative works without due credit or compensation.

This declaration provides substantial grounds for further legal scrutiny, including intellectual property infringement, fraudulent misrepresentation, and unfair business practices under applicable laws. The Plaintiff respectfully submits this declaration as evidence to establish access, substantial similarity, and potential misuse of his original work, Bloodborg.

Declaration

I, Marc Wolstenholme, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. I submit this SECOND DECLARATION OF MARC WOLSTENHOLME REGARDING PUBLIC STATEMENTS BY ARCANE CREATORS AND OTHERS INVOLVED IN THE MAKING OF ARCANE in support of the ongoing litigations- CASE NO. 2:25-CV-00053-FMO-BFM- providing further support of alleged infringement of my original work, Bloodborg, by Riot Games, Inc.

The Plaintiff, Marc Wolstenholme, M.W. Wolf.

Date: FEBRUARY 12, 2025

Signed: *M.WOLSTENHOLME*